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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:21-cr-00429-YGR
)	
Plaintiff,)	PARTIES' SECOND STIPULATIONS
)	REGARDING FACTS AND EVIDENCE
v.)	
)	
RAY J. GARCIA,)	
)	
Defendant.)	
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FACTUAL STIPULATIONS

The United States and Defendant Ray J. Garcia, by and through their counsel of record, hereby stipulate and agree that the following facts are true and correct and may be accepted as fact by the jury:

1. Factual Stipulation No. 8: In accordance with PREA, in 2019, 2020, and 2021, the defendant received annual training regarding the Bureau of Prison's sexual abuse and sexual harassment policies and procedures.

EVIDENTIARY STIPULATIONS

The United States and Defendant Ray J. Garcia, by and through their counsel of record, hereby agree to the following stipulations regarding the authenticity and/or admissibility of certain evidence:

1 1. Exhibits 318-340 are photographs of exterior and interior portions of the F-Unit housing
2 complex at FCI Dublin. These exhibits are authentic within the meaning of Fed. R. Evid. 901 and
3 admissible at trial.

4 2. Exhibits 341-344 are disciplinary records for inmate M.H. These exhibits are authentic within
5 the meaning of Fed. R. Evid. 901 and admissible at trial.

6 3. Exhibit 345 is a transcript of a July 22, 2021 interview of the defendant (the audio recording
7 of this interview is at Exhibit 165). Exhibit 345 is authentic within the meaning of Fed. R. Evid. 901.

8 4. Exhibit 346 is an excerpt of a 2020 Sexually Abusive Behavior Prevention and Intervention
9 Program - Annual Training. This exhibit is authentic within the meaning of Fed. R. Evid. 901 and
10 admissible at trial.

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12 DATED: November 18, 2022

Respectfully submitted,

13 STEPHANIE M. HINDS
14 United States Attorney

15 /s/ Andrew Paulson
16 ANDREW PAULSON
17 MOLLY K. PRIEDEMAN
Assistant United States Attorneys

18 DATED: November 18, 2022

19 /s/ James T. Reilly
20 JAMES T. REILLY
21 Attorney for Defendant Ray J. Garcia
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